

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY	)	
KENTUCKY, INC. FOR AUTHORITY TO ADOPT	)	CASE NO.
A SCIENTIFIC SAMPLE METER TEST PLAN	)	2026-00144
AND DEVIATION FROM ADMINISTRATIVE	)	
REGULATION 807 KAR 5:022, SECTION 3(4)	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 24, 2026. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Duke Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, generally. Provide the study or the analysis that resulted in filing this case.

2. Refer to the Application, page 4, where Duke Energy Kentucky states that "the costs to refurbish, repair, store, and redeploy a once-used diaphragm meter were determined to exceed the costs of simply purchasing a new meter" Explain the

extent to which the costs to refurbish and redeploy a once-used diaphragm meter exceed the costs of purchasing a new Category 1 or 2 meter.

3. Refer to the Application, pages 4-5, paragraph 8, which states that the proposed plan will generate “capital savings and improving efficiency.”

a. Provide the specific annual capital savings Duke Kentucky expects to achieve over each of the six years of the proposed plan.

b. Provide a detailed cost-benefit analysis comparing the status quo testing requirements against the proposed scientific sample plan.

4. Refer to the Application, page 4, paragraph 8, which states Duke Kentucky will “replace significantly fewer Category 1 and 2 Meters each year.” Provide the projected number of meters that will be replaced annually under the proposed plan versus the number of meters replaced under the current 15-year and 5-year replacement cycles.

5. Refer to the Application, page 4, paragraphs 7 and 8. Explain how Duke Kentucky will avoid accelerated depreciation on the sampled Category 1 and 2 Meters if they are tested before the end of their useful lives.

6. Refer to the Application, page 5, paragraph 9. Explain what Duke Kentucky expects to experience after gathering five full years of the proposed Scientific Sample Meter Test (SSMT) Plan. Further, explain why a shorter amount of time would not give Duke Kentucky enough data to determine whether to continue the proposed SSMT Plan.

7. Refer to the Application, generally. Refer also to the Application, Exhibit 2, page 2.

a. Provide Duke Kentucky’s historical gas meter test results for the past ten years, broken down by:

- (1) Manufacturer and model.
- (2) Meter age at the time of the test.

b. Provide the historical percentage of meters tested that exhibited over-registration (fast) and under-registration (slow) beyond the regulatory +/- 2 percent threshold over the past ten years.

8. Refer to the Application, Exhibit 2, page 3, which establishes an Acceptable Quality Level (AQL) of 6.5. Provide engineering and statistical justification for selecting an AQL of 6.5 rather than a stricter consumer-protection threshold (e.g., an AQL of 1.0, 2.5, or 4.0).

9. Refer to the Application, Exhibit 2. Explain why the American National Standards Institute (ANSI) Z1.4 standard was chosen for this plan. Include in this explanation if this methodology has been utilized by other utilities in other jurisdictions.

10. Refer to the Application, Exhibit 2, page 3. Provide the mathematical calculations, confidence intervals, and consumer risk profiles associated with the Single Sampling Plan for Normal Inspection detailed in Table 1.

11. Refer to the Application, exhibit 2, page 4, which proposes a 35-year maximum end-of-life duration for meters up to 500 CFH. Provide all engineering studies, manufacturer specifications, or historical performance data to support a diaphragm meter in service for up to 35 years.

12. Refer to the Application, generally. Explain the impact of the proposed plan on the average customer bill.

13. Refer to the Application, Exhibit 2, page 3. Explain in further detail how the random sample of the meter control groups will be selected.

14. Provide quantifiable cost savings associated with the proposed SSMT plan as opposed to alternative methods as it pertains to Duke Kentucky's ratepayers.

15. Provide information regarding the applicability of the SSMT method to federal and state safety requirements.



Linda C. Bridwell, PE
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DATED **JUL 9 2026**

cc: Parties of Record

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